

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)

) Chapter 11

)

) Case No. 23-11069 (CTG)

)

) (Jointly Administered)

)

) **Re: Docket No. 334**

**JOINT STIPULATION  
BY AND AMONG THE DEBTORS AND BRETT GROVES  
TO (I) EXTEND THE DEADLINE TO RESPOND TO MOTION TO LIFT THE  
AUTOMATIC STAY AND (II) EXTEND THE HEARING DATES RELATED THERETO**

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This joint stipulation (“Stipulation”) is made and entered into by and among (a) the above-captioned debtors and debtors in possession (the “Debtors”)<sup>2</sup> and (b) Brett Groves (the “Movant,” and together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

**RECITALS**

WHEREAS, on August 6, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b) [Docket No. 169]. The Debtors are managing their businesses and their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors’ chapter 11 cases, is set forth in the *Declaration of Matthew A. Doheny, Chief Restructuring Officer of Yellow Corporation, in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 14] (the “First Day Declaration”).

On August 16, 2023, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors [Docket No. 269] (the “Committee”). No trustee or examiner has been appointed in these chapter 11 cases;

WHEREAS, on August 24, 2023, the Movant filed the *Motion of Brett Groves for Relief from the Automatic Stay to the Extent of Liability Insurance Proceeds* [Docket No. 334] (the “Motion”),<sup>1</sup> pursuant to which the deadline for filing a response was set for **September 7, 2023, at 4:00 p.m. (ET)** (the “Response Deadline”) and the hearing date for the Motion was set for **September 18, 2023, at 2:00 p.m. (ET)** (the “Hearing Date”); and

WHEREAS, the Parties have conferred and agreed to extend the Response Deadline for the Debtors and all other parties in interest to respond to the Motion to **October 9, 2023, at 4:00 p.m. (ET)**, and to extend the Hearing Date to **October 23, 2023**.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED as follows:

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. The Response Deadline for the Debtors and all other parties in interest to Respond to the Motion is extended through and including **October 9, 2023, at 4:00 p.m. (ET)**.
3. The Hearing Date for the Motion is extended through and including **October 23, 2023, at 10:00 a.m. (ET)**.
4. The Parties may mutually agree to further extensions of the response deadline and/or hearing date by filing a notice with the Court reflecting such extensions.

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<sup>1</sup> Capitalized terms used but not immediately defined have the meanings given to them in the Motion.

5. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

6. This Stipulation is subject to the approval of the Court and shall be effective upon entry of an order approving this Stipulation by the Court (the “Order”). The Parties hereby consent to the entry of the Order and waive any right to notice or hearing on the approval of the Stipulation.

7. The Court retains exclusive jurisdiction with respect to any disputes arising from or other actions to interpret, administer, or enforce the terms and provisions of this Stipulation and the Order.

**STIPULATED AND AGREED TO THIS 7TH DAY OF SEPTEMBER, 2023:**

Dated: September 7, 2023  
Wilmington, Delaware

*/s/ Laura Davis Jones*

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